

FARLEY J. NEUMAN, ESQUIRE - State Bar #100021
TOM PROUNTZOS, ESQUIRE - State Bar #209409
JENKINS GOODMAN NEUMAN & HAMILTON LLP
417 Montgomery Street, 10th Floor
San Francisco, California 94104
Telephone: (415) 705-0400
Facsimile: (415) 705-0411

Attorneys for DEFENDANT ROBERT J. NAGY

IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

vs.

CHARLES CARTCART, SCOTT
CATHCART, YURIJ DEBEVC, a/k/a/
YURIJ DEBEVC, ROBERT NAGY,
DERIVUM CAPITAL, LLC,
DERIVUM CAPITAL (USA), INC.,
and VERIDIA SOLUTIONS, LLC,

Defendants.

Case No. C 07 4762 PJH

**STIPULATION AND ORDER
SHORTENING NOTICE OF MOTION
OF DEFENDANT ROBERT J. NAGY
TO CONTINUE THE TRIAL DATE
AND ALL ASSOCIATED DEADLINES**

Dept.: Room 3, 17th Floor
Judge: Hon. Phyllis J. Hamilton

Trial: March 23, 2009

Plaintiff UNITED STATES OF AMERICA and Defendants CHARLES
CARTCART, SCOTT CATHCART, YURIJ DEBEVC (aka YURI DEBEVC), ROBERT NAGY,
OPTECH LIMITED, and CHI-HSIU HSIN (aka CHARLES HSIN) (collectively, "Defendants")
hereby stipulate and agree that the following Order should be entered in this case.

//

Jenkins Goodman
Neuman & Hamilton
LLP
417 Montgomery St.
10th Floor
San Francisco, CA
94104
(415) 705-0400

1 **1. RECITALS AND STIPULATION**

2 1.1 By way of a Case Management Order dated January 4, 2008, this Court set the
3 following deadlines: (a) expert disclosure date of August 20, 2008; (b) non-expert discovery cut-
4 off of September 3, 2008; (c) expert discovery cut-off of October 1, 2008; and (d) deadline to hear
5 dispositive motions of November 19, 2008. Trial is currently set for March 23, 2009.

6 1.2 Defendant ROBERT NAGY has prepared and is filing a Motion to Continue Trial
7 Date and Associated Deadlines (hereinafter "Motion") continuing the trial date from March 23,
8 2009 to May 18, 2009 and all associated deadlines as follows: (a) expert disclosure deadline
9 continued from August 20, 2008 to October 15, 2008; (b) non-expert discovery cut-off continued
10 from September 3, 2008 to October 29, 2008; (c) expert discovery cut-off continued from October
11 1, 2008 to November 26, 2008; and (d) deadline to hear dispositive motions continued from
12 November 19, 2008 to January 14, 2009.

13 1.3 All of the parties hereby stipulate that the Motion may be heard on shortened
14 notice on September 17, 2008. However, counsel for CHI-HSIU HSIN (aka CHARLES
15 HSIN), OPTECH LIMITED and CHARLES CATHCART have expressed that the sought
16 continuance is not sufficiently long enough. CHI-HSIU HSIN (aka CHARLES HSIN) and
17 OPTECH LIMITED, represented by Edward O.C. Ord, will be filing their own motion for a
18 continuance seeking a longer continuance.

19 IT IS SO STIPULATED THROUGH COUNSEL OF RECORD.

20 DATED: September 3, 2008

JENKINS GOODMAN NEUMAN &
HAMILTON LLP

21
22 By: /S/ Tom Prountzos

23 TOM PROUNTZOS

24 Attorneys for Defendant ROBERT J. NAGY

25
26
Jenkins Goodman
Neuman & Hamilton
LLP
417 Montgomery St.
10th Floor
San Francisco, CA
94104
(415) 705-0400

1 DATED: September 3, 2008

THE UNITED STATES

2
3 By: /S/ Allyson B. Baker

ALLYSON B. BAKER

4 Trial Attorney, Tax Division

5 Attorneys for Plaintiff UNITED STATES OF
AMERICA

6 DATED: September 3, 2008

CAPLIN & DRYSDALE

7
8 By: /S/ Matthew C. Hicks

9 DANIEL B. ROSENBAUM, Pro Hac Vice

MATTHEW C. HICKS, Pro Hac Vice

10 Attorneys for Defendant SCOTT CATHCART

11 DATED: September 3, 2008

BARTSCH & WEBB

12
13 By: /S/ Eric L. Webb

14 ERIC L. WEBB

15 Attorneys for Defendant CHARLES
CATHCART

16 DATED: September 3, 2008

ORD & NORMAN

17
18 By: /S/ Edward O.C. Ord

19 EDWARD O. C. ORD

20 Attorneys for Defendants OPTECH LIMITED,
and CHI-HSIU HSIN

21 DATED: September 4, 2008

22
23 By: /S/ Yurij Debevc

24 YURIJ DEBEVC, Defendant In Propria
Persona

ORDER

Good cause appearing therefore, the following stipulation is hereby entered by this Court:

ROBERT NAGY'S Motion to Continue Trial Date and Associated Deadlines shall be heard by this Court on September 17, 2008.

IT IS SO ORDERED.

DATED: _____

HONORABLE PHYLLIS J. HAMILTON
United States District Court, Northern
District of California